### UNITED STATES DISTRICT COURT

### **DISTRICT OF OREGON**

UNITED STATES OF AMERICA

CR 07-93-KI

v.

SUPERSEDING INDICTMENT

REVERIANO MORALES MENDOZA, a.k.a "VATO LOCO," IVAN HERNANDEZ PEREZ, DIANGELO DUPRE HARRIS, a.k.a. "D,"

JOHN FREDERICK EDWARDS, JR. a.k.a. "BOOKMAN," THERON DARON MILLER, a.k.a. "GHOST,"

PATRICIA ANN ANDERSON, a.k.a. "TRISH,"

WILLIAM LOUIS TAYLOR, a.k.a. "UNCLE WILL,"

JOHNNY RAY BROWN, a.k.a. "BOOYA,"

and.

TYRON WALKER JAMES, a.k.a. "TY,"

Defendants.

21 U.S.C. §§ 841(a)(1), 841(b)(1)(B), 846 and 853 18 U.S.C. §§ 922(g)(1) and 924(c)

UNDER SEAL

### Count 1:

THE GRAND JURY CHARGES:

[Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Cocaine Base]

From approximately December 30, 2006, the exact date being unknown to the grand jury, and continuing through April 11, 2007, in the District of Oregon, REVERIANO MORALES MENDOZA, a.k.a "VATO LOCO," IVAN HERNANDEZ PEREZ, DIANGELO DUPRE HARRIS, a.k.a. "D," JOHN FREDERICK EDWARDS, JR. a.k.a. "BOOKMAN,"

THERON DARON MILLER, a.k.a. "GHOST," PATRICIA ANN ANDERSON, a.k.a. "TRISH," WILLIAM LOUIS TAYLOR, a.k.a. "UNCLE WILL," JOHNNY RAY BROWN, a.k.a. "BOOYA," and, TYRON WALKER JAMES, a.k.a. "TY," defendants herein, and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and five grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.

# **Count 2:**[Possession with the Intent to Distribute Cocaine]

On or about March 20, 2007, in the District of Oregon, **REVERIANO MORALES MENDOZA**, defendant herein, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

## **Count 3:**[Possession with Intent to Distribute Cocaine Base]

On or about April 11, 2007, in the District of Oregon, **JOHNNY RAY BROWN**, a.k.a. "BOOYA," defendant herein, did knowingly and intentionally possess with intent to distribute 5 grams or more of a mixture and substance which contains cocaine base, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

On or about April 11, 2007, in the District of Oregon ,JOHNNY RAY BROWN, a.k.a. "BOOYA," defendant herein, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) On or about November 3, 1994, in Multnomah County Circuit Court, State of Oregon, case number C93-12-38594, for Robbery III;
- On or about November 1, 1991, in Multnomah County Circuit Court, State of Oregon, case number C91-04-31827, for Possession of a Controlled Substance, Schedule II;

did knowingly and unlawfully possess the following firearm:

A Hi-Point, Model C, 9mm semi-automatic handgun, with serial number P072476, which had previously been transported in interstate commerce; all in violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT 5**

[Using, Carrying or Possessing a Firearm During and in Relation to a Drug Trafficking Crime]

On or about April 11, 2007, in the District of Oregon, **JOHNNY RAY BROWN**, a.k.a. "BOOYA," defendant herein, during and in relation to a drug trafficking offense for which he could be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base in violation of Title 21, United States Code, Section 841(a)(1) as set forth in Count 3, did knowing use, carry and, in the furtherance of that crime, possess a Hi-Point, Model C, 9mm semi-automatic handgun, with serial number P072476, all in violation of Title 18, United

States Code, Section 924(c)(1).

### <u>Criminal Forfeiture Allegation</u> [Controlled Substance Offense]

MORALES MENDOZA, a.k.a "VATO LOCO," IVAN HERNANDEZ PEREZ,
DIANGELO DUPRE HARRIS, a.k.a. "D," JOHN FREDERICK EDWARDS, JR. a.k.a.
"BOOKMAN," THERON DARON MILLER, a.k.a. "GHOST," PATRICIA ANN
ANDERSON, a.k.a. "TRISH," WILLIAM LOUIS TAYLOR, a.k.a. "UNCLE WILL,"
JOHNNY RAY BROWN, a.k.a. "BOOYA," and, TYRON WALKER JAMES, a.k.a. "TY,"
defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code,
Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly,
as a result of the said violations and any property used, or intended to be used, in any manner or
part, to commit, or to facilitate the commission of the said violations, including but not limited
to: \$67,906 in United States Currency.

DATED this // day of April 2007.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

KARIN J. IMMERGUT United States Attorney

SCOTT M. KERIN, OSB #96512

Assistant United States Attorney

THOMAS H. EDMONDS, OSB #90255

Assistant United States Attorney

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